

MICHAEL R. MUSHKIN, ESQ.  
Nevada Bar No. 2421  
L. JOE COPPEDGE, ESQ.  
Nevada Bar No. 4954  
MUSHKIN CICA COPPEDGE  
4495 S. Pecos Road  
Las Vegas, Nevada 89121  
Telephone: (702) 386-3999  
Facsimile: (702) 454-3333  
[michael@mccnvlaw.com](mailto:michael@mccnvlaw.com)  
[jcoppedge@mccnvlaw.com](mailto:jcoppedge@mccnvlaw.com)

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

<p>BRUCE COUTURIER and ELEANOR COUTURIER,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>AMERICAN INVSCO, et al.,</p> <p>Defendants.</p>	<p>Case no.: 2:12-cv-01104-APG-NJK Consolidated with Case No's for Trial:</p> <p>2:12-cv-01106-APG-NJK 2:12-cv-01107-APG-NJK 2:12-cv-01108-APG-NJK 2:12-cv-01110-APG-NJK 2:12-cv-01111-APG-NJK</p> <p><b>JOINT RULE 6(B)(1) MOTION FOR EXTENSION OF TIME PROVIDED BY LR 54-14 &amp; ORDERS DATED JUNE 28 &amp; 29, 2018 (SECOND REQUEST)</b></p>
<p>SHAHIN EDALATDJU and NASILA EDALATDJU,</p> <p>Plaintiffs,</p> <p>vs.</p> <p>AMERICAN INVSCO, et al.,</p> <p>Defendants.</p>	<p>Case no.: 2:12-cv-01106-APG-NJK Consolidated with Case No's for Trial:</p> <p>2:12-cv-01104-APG-NJK 2:12-cv-01107-APG-NJK 2:12-cv-01108-APG-NJK 2:12-cv-01110-APG-NJK 2:12-cv-01111-APG-NJK</p>

<p>1 MARY HELDT, VICTOR HELDT, and SNAP  2 PROPERTIES, LLC, a Nevada Limited  3 Liability Company,  4 Plaintiffs,  5 vs.  6 AMERICAN INVSCO, et al.,  7 Defendants.</p>	<p>Case no.: 2:12-cv-01107-APG-NJK  Consolidated with Case No's for Trial:  2:12-cv-01104-APG-NJK  2:12-cv-01106-APG-NJK  2:12-cv-01108-APG-NJK  2:12-cv-01110-APG-NJK  2:12-cv-01111-APG-NJK</p>
<p>8 NASIR KOSA; BASIL KOSA, and SAID  9 MATTI,  10 Plaintiffs,  11 vs.  12 AMERICAN INVSCO, et al.,  13 Defendants.</p>	<p>Case no.: 2:12-cv-01108-APG-NJK  Consolidated with Case No's for Trial:  2:12-cv-01104-APG-NJK  2:12-cv-01106-APG-NJK  2:12-cv-01107-APG-NJK  2:12-cv-01110-APG-NJK  2:12-cv-01111-APG-NJK</p>
<p>14 WISAM KOSA, RAGHID KOSA and MAHA  15 KOSA;  16 Plaintiffs,  17 vs.  18 AMERICAN INVSCO, et al.,  19 Defendants.</p>	<p>Case no.: 2:12-cv-01111-APG-NJK  Consolidated with Case No's for Trial:  2:12-cv-01104-APG-NJK  2:12-cv-01106-APG-NJK  2:12-cv-01107-APG-NJK  2:12-cv-01108-APG-NJK  2:12-cv-01110-APG-NJK</p>

21                   **JOINT RULE 6(B)(1) MOTION FOR EXTENSION OF TIME**  
22                   **PROVIDED BY LR 54-14 &**  
23                   **ORDERS DATED JUNE 28 & 29, 2018**  
24                   **(SECOND REQUEST)**

25         The parties, by and through their respective counsel, hereby move for entry of an order  
26 under FRCP 6(b)(1) extending the periods provided by LR 54-14 and this court's orders dated  
27 June 28 & 29, 2018 pertaining to motions for attorney's fees in each of the above actions, for the  
following reasons:

28         1.         These actions have been pending before this court since their removal in October

1 2008.

2       2. On June 28 & 29, 2018, the court entered orders and judgments of final  
3 adjudication regarding each of them.

4       3. In those orders, the court instructed Plaintiffs to file motions for attorney's fees (if  
5 any) within 14 days (i.e., on or before July 12, 2018 (as to certain of these actions) and July 13,  
6 2018 (as to the rest). It also instructed Plaintiffs' counsel to confer with Defendant Meridian's  
7 counsel regarding such matters before filing any such motion.

8       4. LR 54-14 provides that motions for attorney's fees are to be filed within 14 days  
9 of the entry of a final judgment or order disposing of an action which the United States Supreme  
10 Court has held is the date of entry of an order disposing of the substantive elements of an action,  
11 despite the existence or potential for a motion for attorney's fees. *Ray Haluch Gravel Co. v. Cent.*  
12 *Pension Fund of Int'l Union of Operating Engineers & Participating Employers*, 134 S. Ct. 773  
13 (2014).

14       5. Counsel for all Plaintiffs and the principal Defendants, Koval Flamingo, LLC and  
15 Meridian Private Residences CH, LLC have previously requested an extension of time to  
16 effectively review each parties' claim(s) for attorney's fees.

17       6. Counsel for all Plaintiffs and the principal Defendants, Koval Flamingo, LLC and  
18 Meridian Private Residences CH, LLC have conferred about such matters and are still in  
19 discussions regarding each parties' claim(s) for attorney's fees and that it would unduly burden  
20 the court and the parties to require such motions to be filed within the period provided by LR 54-  
21 14 and the court's orders of June 28 & 29, 2018.

22       7. Accordingly, there is good cause within the meaning of FRCP 6(b)(1) for an  
23 extension of the period within which to file the parties' respective motions for attorney's fees in  
24 these actions.

25       ///

26       ///

27       ///

28       ///

1       8.     The parties are requesting an additional thirty (30) days to continue discussions  
2 regarding each parties' claim(s) for attorney's fees.

3       9.     This motion is timely pursuant to FRCP 6(b)(1)(A) in that it has been filed prior  
4 to the expiration of the period for which extension is sought.

5              Dated this 9<sup>th</sup> day of August, 2018

6              MUSHKIN CICA COPPEDGE

7  
8       /s/ Michael R. Mushkin                                  \\  
9       MICHAEL R. MUSHKIN, ESQ.  
10      Nevada State Bar No. 2421  
11      L. JOE COPPEDGE, ESQ.  
12      Nevada State Bar No. 4954  
13      4475 So. Pecos Road  
14      Las Vegas, Nevada 89121

15  
16      *Attorneys for Plaintiffs*

6              KENNETH B. MORGAN, P.C.

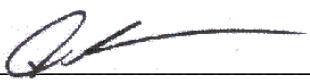
7  
8       /s/ Kenneth B. Morgan                                  \\  
9       Kenneth B. Morgan, Esq. (*Pro Hac Vice*  
10      *Admitted*)  
11      180 High Oak Drive, Suite 202  
12      Bloomfield Hills, MI 48304

13  
14      LAWRENCE J. SEMENZA, III, P.C.  
15      Lawrence J. Semenza, III, Esq., Bar No. 7174  
16      Christopher D. Kircher, Esq., Bar No. 11176  
17      Jarrod L. Rickard, Esq., Bar No. 10203  
18      10161 Park Run Drive, Suite 150  
19      Las Vegas, Nevada 89145

20  
21      *Attorneys for Defendant Meridian Private*  
22      *Residences CH, LLC*

23              IT IS SO ORDERED.

24              Dated: August 10, 2018.

25  
26  
27  
28                
                    \_\_\_\_\_  
                    UNITED STATES DISTRICT JUDGE